

Patrick W. Brophy, Esq.  
McMahon, Martine & Gallagher, LLP  
55 Washington Street, Suite 270  
Brooklyn, NY 11201  
T: (212) 747-1230  
*Local Counsel for Wright National Flood Insurance Company,  
Formerly known as Fidelity National Property and Casualty Insurance Company*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

<b>MEGAN WALLACE</b>	*	
<b>PLAINTIFF,</b>	*	
	*	<b>CASE NO.:1:13-CV-07461-ALC</b>
<b>VERSUS</b>	*	
	*	
<b>THE STANDARD FIRE INSURANCE</b>	*	
<b>CO., NEW YORK PROPERTY</b>	*	
<b>INSURANCE UNDERWRITING</b>	*	
<b>ASSOCIATION AND FIDELITY</b>	*	
<b>NATIONAL PROPERTY AND</b>	*	
<b>CASUALTY INSURANCE</b>	*	
<b>COMPANY</b>	*	
<b>DEFENDANTS.</b>	*	

-----

**CORPORATE DISCLOSURE STATEMENT**  
**OF WRIGHT NATIONAL FLOOD INSURANCE COMPANY**

DEFENDANT, WRIGHT NATIONAL FLOOD INSURANCE COMPANY, (formerly known as Fidelity National Property and Casualty Insurance Company), in compliance with the Federal Rules of Civil Procedure Rule 7.1 and Local Rules, files this corporate disclosure statement to enable Judges and Magistrate Judges to evaluate possible disqualification or recusal, and the undersigned counsel for Fidelity certifies that the following are parents, subsidiaries and/or affiliates of said party that have issued shares or debt securities to the public:

1. Fidelity National Indemnity Insurance Company is a wholly owned subsidiary of WRM America Indemnity Company, Inc.<sup>4</sup>
2. WRM America Indemnity Company, Inc. is a wholly owned subsidiary of WRM America Intermediate Holding Company, Inc.
3. WRM America Intermediate Holding Company, Inc. is a wholly owned subsidiary of WRM America Holding Company, LLC.<sup>5</sup>
4. No publicly traded company owns ten percent (10%) or more of any of the aforementioned companies' stock. One publicly traded company owns a membership interest in WRM America Holding Company, LLC that exceeds 10%. Swiss Reinsurance America Corporation, a New York corporation with its principal place of business in New York, owns an approximately 15% membership interest in WRM America Holding Company, LLC. Swiss Reinsurance America Corporation is wholly owned by Swiss Re Solutions Holding Corporation. Swiss Re Solutions Holding Corporation is wholly owned by Swiss Re America Holding Corporation. Swiss Re America Holding Corporation is wholly owned by Swiss Reinsurance Company Ltd. Swiss Reinsurance Company Ltd is wholly owned by Swiss Re Ltd, a publicly traded company in Switzerland. No publicly held corporation owns 10% or more of the shares of Swiss Re Ltd.
5. Fidelity National Financial, Inc. (FNF) is a Delaware corporation and, at the time of the events alleged in the Complaint, was the parent corporation for Fidelity National Indemnity Insurance Company. FNF's stock is traded on the New York Stock

---

<sup>4</sup> Fidelity National Property and Casualty Company and Fidelity Indemnity Insurance Company are now known as "Wright National Flood Insurance Company."

<sup>5</sup> Now known as The Wright Insurance Group, LLC.

Exchange (NYSE: FNF). FNF's principal place of business is 601 Riverside Ave., Jacksonville, FL 32204. No shareholder owns 10% or more of FNF.

Further, the party in interest in this matter is the Federal Emergency Management Agency, as all claims payments under a Standard Flood Insurance Policy are paid for with U.S. Treasury funds (not the funds of Fidelity) pursuant to the Arrangement by and between the Federal Emergency Management Agency and the Write-Your-Own Program carriers such as Fidelity. See 44 C.F.R. Pt. 62, App. A, Articles II and III; see also, 42 U.S.C. §4017.

WHEREFORE, Defendant, Wright National Flood Insurance Company, formerly Fidelity National Property and Casualty Insurance Company, deems that this disclosure be deemed good and sufficient, and in accordance with the Federal and Local rules.

Respectfully submitted:

/s/ Patrick W. Brophy  
Patrick W. Brophy  
Anthony D. Martine  
McMahon, Martine & Gallagher, LLP  
55 Washington Street, Suite 270  
Brooklyn, NY 11201  
P: (212) 747-1230  
F: (212) 747-1239  
[amartine@mmglawyers.com](mailto:amartine@mmglawyers.com)  
[pbrophy@mmglawyers.com](mailto:pbrophy@mmglawyers.com)  
Local Counsel for Wright National Flood  
Insurance Company

and

Deani B. Milano, LA. Bar No. 24358  
Nielsen, Carter & Treas, LLC  
3838 North Causeway Blvd., Ste. 2850  
Metairie, LA 70002  
Email: [dmilano@nct-law.com](mailto:dmilano@nct-law.com)  
T. 504.837.2500; F. 504.832.9165  
National Counsel for Wright National Flood  
Insurance Company

**CERTIFICATE OF SERVICE**

I hereby Certify that on this 25<sup>th</sup> day of November, 2013, a true and correct copy of the foregoing pleading was filed using the Court's CM/ECF system and a copy will be generated to counsel named below:

Barbara Matarazzo  
The Law Office of Barbara A. Matarazzo  
1025 Westchester Avenue, Suite 402  
White Plains, NY 10601  
Counsel for Plaintiff

Counsel for The Standard Fire Insurance Co.

Counsel for New York Property Insurance Underwriting Association

/s/ Patrick W. Brophy  
Patrick W. Brophy